

# **EXHIBIT D**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

FACEBOOK, INC., and MARK  
ZUCKERBERG,

Plaintiff,

vs.

Case No.  
5:07-CV-01389-RS

CONNECTU, INC., (formerly known  
as CONNECTU, LLC), CAMERON  
WINKLEVOSS, TYLER WINKLEVOSS,  
DIVYA NARENDRA, PACIFIC NORTHWEST  
SOFTWARE, INC., WINSTON WILLIAMS,  
WAYNE CHANG, and DAVID GUCWA  
and DOES 1-25,

Defendants.

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\*\*\*\*\* HIGHLY CONFIDENTIAL \*\*\*\*\*

VIDEOTAPED DEPOSITION OF WINSTON WILLIAMS

Tuesday, June 19, 2007

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SHEILA CHASE & ASSOCIATES  
REPORTING FOR:  
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Reported by:  
RACHEL FERRIER, CSR  
CSR No. 6948

1 Q All right. Those are the only three IP  
2 addresses you have ever accessed thefacebook.com  
3 Website from?

4 A No.

5 Q All right. What other IP addresses have  
6 you accessed it from?

7 A Various. Many, many IP addresses that I  
8 don't have any log or recollection of.

9 Q Okay. And were any of those addresses  
10 addresses associated with friends' computers?

11 A Probably.

12 Q All right. Would that be Joel Voss?

13 A I believe I have access to the site using  
14 his machine, yes.

15 Q All right. Any other friends you can think  
16 of that you used?

17 A My brother.

18 Q Okay. And that's Colin Williams?

19 A Yes.

20 Q And does he reside in Washington now?

21 A Yes.

22 Q All right. Anybody else?

23 A I can't recall.

24 Q All right. Did you ever use any computer  
25 that was provided to you by Cameron Winklevoss to